

State Water Resources Control Board

December 19, 2018

(Via email and Certified Mail)
CERTIFIED MAIL
NO. 7018 0680 0000 1017 6311

Mr. Jerry Arguelles
Utility Services Coordinator
Calexico International Airport
608 Heber Avenue
Calexico, California 92231
airport@calexico.ca.gov

**SUBJECT: NOTICE OF VIOLATION; UNDERGROUND STORAGE TANK SYSTEMS
LOCATED AT THE CALEXICO INTERNATIONAL AIRPORT, 801 WEST
SECOND STREET, CALEXICO**

Dear Mr. Arguelles:

As part of an initiative by the State Water Resources Control Board (State Water Board) to ensure compliance at government-owned and/or operated underground storage tank (UST) facilities in California, the State Water Board staff inspected the USTs at your facility on December 6, 2018, pursuant to authority under Health and Safety Code (H&SC), chapter 6.7, section 25289.

The State Water Board has identified the following violations pursuant to H&SC, chapter 6.7, and California Code of Regulations (CCR), title 23, chapter 16:

No.	Violation	Tank	Start Date	Stop Date	Regulation
1	Failure to meet Monthly Designated Operator (DO) Inspections Requirements – The DO monthly report dated October 16, 2018, was not recorded on the new form entitled “Designated Underground Storage Tank Operator Visual Inspection Report.”	All	November 1, 2018	November 1, 2018	23 CCR 2716(c)
2	Failure to Maintain Facility Information – In CERS, under financial responsibility mechanisms, self-insurance lists “yes”; however, it should list “no.” Insurance should list “yes.” In addition, facility type lists “farm”; however, “motor vehicle fueling” was observed.	All	December 6, 2018	Ongoing	23 CCR 2711(a)

Office of Enforcement | 801 K Street, Suite 2300 | Sacramento, CA 95814 | 916.341.5272

FELICIA MARCUS, CHAIR | EILEEN SOBECK, EXECUTIVE DIRECTOR

No.	Violation	Tank	Start Date	Stop Date	Regulation
3	Failure to Maintain Tank Information – In CERS under fill components installed for the Avgas tank, containment sump lists “no”; however, it should list “yes.” In addition, for the Jet A tank, under fill components installed, containment sump list “yes”; however, it should list “no.”	All	December 6, 2018	Ongoing	H&SC 25286(a); 23 CCR 2711(a)
4	Failure to Install Monitoring Equipment According to Manufacturer Instructions – The FE Petro line leak detector (LLD) installed on the tank turbine pump is only suitable for use with diesel fuels or kerosene.	Jet A	December 6, 2018	Ongoing	23 CCR 2638(a)
5	Failure to Maintain Monitoring Plan – In CERS, under pipe monitoring, mechanical LLD, the detector model is not listed. In addition, for under dispenser containment monitoring (UDC), UDC monitoring stops flow of product at dispenser lists “yes”; however, it should list “no.”	All	December 6, 2018	Ongoing	H&SC 25286(a); 23 CCR 2632(d)(1)
6	Failure to Monitor Product Piping – The sensor located in the turbine sump was located on the wrong side of the sump, opposite the product line, preventing it from detecting a leak at the earliest opportunity.	Jet A	December 6, 2018	Ongoing	23 CCR 2630(d)

You are directed to correct the ongoing violations and submit compliance documentation to the State Water Board and Department of Toxic Substances Control, Imperial County CUPA within sixty (60) days from the date of this letter. Have your DO make specific notations in the next monthly DO report indicating the ongoing violations have been corrected. The monthly DO report and any associated photos must be submitted as proof of compliance.

Please send all compliance documentation to the following:

State Water Board

Mr. Douglas McDevitt
UST Enforcement Unit
Office of Enforcement
State Water Resources Control Board
801 K Street, Suite 2300
Sacramento, California 95814
douglas.mcdevitt@waterboards.ca.gov

Local CUPA

Mr. Robert Krug
Supervising / Senior Environmental Scientist
Department of Toxic Substances Control
Imperial County CUPA
627 Wake Avenue
El Centro, California 92243
robert.krug@dtsc.ca.gov

Pursuant to Health and Safety Code, chapter 6.7, section 25299, the owner and operator of the tank(s) are liable for a penalty of \$500 to \$5,000 per tank, per day of violation. These penalties will continue to accrue until the violations have been corrected.

If you have any questions, please contact me at (916) 341-5891, or by email at matthew.buffleben@waterboards.ca.gov.

Sincerely,



Dr. Matthew Buffleben
Supervising Water Resource Control Engineer
Acting Supervisor, UST Enforcement Unit
Office of Enforcement

cc: *(via email only)*

Mr. Robert Krug
Supervising Senior Environmental Scientist
Department of Toxic Substances Control
Imperial County CUPA
robert.krug@dtsc.ca.gov